

## **Exhibit 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

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**MDL No. 2492**

**Master Docket No. 1:13-cv-09116**

**Judge John Z. Lee**

**Magistrate Judge M. David Weisman**

**DECLARATION OF RACHEL CHRISTMAN  
REGARDING UPDATED NOTICE PROGRAM EXPENSES**

I, Rachel Christman, hereby declare and state as follows:

1. I am employed as Senior Project Manager by Gilardi & Co. LLC (“Gilardi”), a KCC Class Action Services company. Gilardi has been retained to administer the Notice Program in this matter.

2. I submit this declaration in support of Gilardi Invoice US\_GILH1630967, attached hereto as Exhibit A. This invoice addresses direct notice and administration costs from February 1, 2019 through July 31, 2020. These costs total \$13,799.99 and, except where the scope of work exceeded initial projections as further outlined below, are in line with the costs addressed in the Second Declaration of Rachel Christman Regarding Notice Program Expenses, filed March 3, 2017 (“March 2017 Declaration”) (Dkt. #365-1).

3. The total budget in this matter is \$2,164,871.47 after sales tax. As of the date of this declaration, the total amount billed and paid to Gilardi is \$2,264,609.29 (\$2,234,496.04 in administrative costs and expenses plus \$30,113.25 in sales tax). Should the Court approve payment of US\_GILH1630967, the total amount paid will equal \$2,278,409.28 (\$2,248,296.03 in administrative costs and expenses plus \$30,113.25 in sales tax).

4. As Gilardi has transferred ownership of the Settlement Website and Toll Free Number to the Program Administrator along with copies of all NCAA Class Member data, Gilardi's work on this phase of the Notice Program in this matter is complete. As such, this will be the final Gilardi invoice for direct notice and administration costs until the reminder mailings.<sup>1</sup> The costs for which Gilardi is seeking reimbursement are set forth below.

5. Server Space Rental: Settlement Website (\$0.00). This was addressed in Paragraph 13.g of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$250.00. Gilardi previously billed and was paid \$250.00 in this category, leaving \$0.00 in the projected budget. Gilardi has incurred billing costs of \$650.00. This invoice includes a discount of \$650.00 to reach the budgeted cost.

6. Project Management (\$7,804.00). The March 2017 Declaration projected costs in the amount of \$59,900.00 for project management. Gilardi previously billed and was paid \$22,925.00 in this category. US\_GILH1630967 includes three line items under this category. When consolidated with the amounts previously billed and paid, Gilardi is under-budget in this category by \$29,171.00.

- a. General Project Management (\$4,654.00). This amount includes general management of the project as was addressed in Paragraph 13.c of the March 2017 Declaration, as well as ten (10) hours of time required to close the case within Gilardi's various recordkeeping systems.

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<sup>1</sup> Costs related to the four (4) reminder mailings addressed in Section XI.A.3 of the Second Amended Class Action Settlement Agreement and Release are neither addressed in this declaration, nor were they addressed in the March 2017 Declaration. Such costs will be addressed at the time of each reminder mailing.

- b. Prepare and Transfer Data to Program Administrator (\$2,500.00). This amount represents project management and staff time to collate and categorize data files submitted by NCAA Member Institutions as well as copies of the mailing databases used in the Notice Program for transfer to the Program Administrator.
- c. Transfer Website to Program Administrator (\$650.00). This amount represents project management and staff time to transfer ownership of the Settlement Website and email address to the Program Administrator.

7. Correspondence Processing (\$56.00). This was addressed in Paragraph 13.j of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$2,883.00. Gilardi previously billed and was paid \$6,506.00 in this category. The total billed amount in this category exceeds the projected budget by \$3,679.00. This amount has not been discounted as this reflects the actual time necessary to process and respond to the higher than expected volume of both emailed and mailed correspondence from Class Members.

8. IVR Line Charges (\$1,497.49), IVR Transfer Fee (\$550.44), & Staff Hours Providing Phone Support (\$3,892.06): (\$5,939.99 in total). These categories were addressed in Paragraph 13.n of the March 2017 Declaration, wherein Gilardi projected costs in the amount of \$7,935.01. Gilardi previously billed and was paid \$50,043.44 in this category. The total billed amount in this category exceeds the projected budget by \$48,048.42. This amount has not been discounted as this reflects the actual time necessary to handle the higher than anticipated call volume in this case.

9. Gilardi is requesting payment of Invoice US\_GILH1630967 in the amount of \$13,799.99. If approved, this would result in an overall cost of \$2,278,409.28 for Settlement

Administration (\$2,248,296.03 in administrative costs and expenses plus \$30,113.25 in sales tax). The pre-tax amount of \$2,248,296.03 is \$97,715.83 (4.50%) more than the budget previously approved by the court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18<sup>th</sup> day of December, 2020.

A handwritten signature in black ink that reads "Rachel Christman". The signature is written in a cursive, flowing style. It is positioned above a solid horizontal line.

Rachel Christman

# **EXHIBIT A**



NCAA Student-Athlete Concussion  
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**Job Number** SACL1

<b>Account Number</b>	SAC-GIL	<b>Invoice Date</b>	27 August 2020
<b>Invoice Number</b>	US_GILH1630967	<b>Due Date</b>	26 September 2020

For services rendered through the end of July 2020

<b><u>Expenses</u></b>	<b><u>Units</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Server Space Rental: Settlement Website	13	\$50.00	\$650.00
IVR Transfer Fee	3,058	\$0.18	\$550.44
IVR Line Charges	8,319.4	\$0.18	\$1,497.49
Staff Hours Providing Phone Support	3,113.64	\$1.25	\$3,892.06
Client Courtesy Discount	-13	\$50.00	\$(650.00)
<b>Total Expenses</b>			<b>\$5,939.99</b>

<b><u>Staff Hours</u></b>	<b><u>Units</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Project Management: Prepare and Transfer Data to Program Administrator	25	\$100.00	\$2,500.00
Project Management: Transfer website to Program Administrator	6.5	\$100.00	\$650.00
Correspondence Processing	0.56	\$100.00	\$56.00
General Project Management	46.54	\$100.00	\$4,654.00
<b>Total Staff Hours</b>			<b>\$7,860.00</b>



Account Number	SAC-GIL		Invoice Date	27 August 2020
Invoice Number	US_GILH1630967		Due Date	26 September 2020

For services rendered through the end of July 2020

Invoice Subtotal	\$13,799.99
Total Sales and Use Tax	\$0.00
Total Amount Due	<u>\$13,799.99</u>